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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

Attorneys for Plaintiff
FIGUEROA PROJECT 2, L.L.C.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FIGUEROA PROJECT 2, L.L.C.,

Plaintiff,

vs.

CITY OF LOS ANGELES, a California
municipal corporation,

Defendant.

Case No.

~~CV 08-08508~~ PA VIEW

COMPLAINT AND REQUEST
FOR DECLARATORY AND
INJUNCTIVE RELIEF

JURY DEMAND

COMPLAINT
AND REQUEST FOR DECLARATORY AND INJUNCTIVE RELIEF

COMES NOW Plaintiff Figueroa Project 2, L.L.C. ("Project") and for a
cause of action against Defendant City of Los Angeles, a California municipal
corporation ("City"), hereby alleges as follows:

PARTIES

1. Plaintiff Project is a limited liability company authorized to do and
doing business in the State of California. Project is in the business of leasing
wall space from local property owners for the purpose of posting and operating
advertising signs.

BY FAX

1 2. Defendant City is a political subdivision of the State of California
2 located in the County of Los Angeles. The City has enacted and is enforcing a
3 comprehensive set of Sign Regulations.¹

4 **JURISDICTION**

5 3. Plaintiff's claims arise under the First and Fourteenth Amendments
6 to the United States Constitution, Section 1983 of the Civil Rights Act, and
7 Section 2201 and 2202 of the Declaratory Judgment Act. This Court has original
8 jurisdiction pursuant to 28 U.S.C. § 1331. Plaintiff's state law claims are so
9 related to Plaintiff's federal law claims that this Court has supplemental
10 jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367.

11 4. Defendant is subject to the jurisdiction of this Court and venue is
12 proper against Defendant pursuant to 28 U.S.C. § 1391(b) under the facts and
13 circumstances as alleged herein.

14 **GENERAL FACTUAL ALLEGATIONS**

15 5. Within the last few months, Project and the owners of the properties
16 located at (i) 888 S. Figueroa Street, Los Angeles, California 90017, (ii) 757
17 Flower Street, Los Angeles, California 90017, and (iii) 1106 S. Broadway, Los
18 Angeles, California 90015 (collectively referred to as "the subject properties")
19 entered into lease agreements authorizing Project to utilize the walls of the
20 buildings located on the properties for the purpose of displaying advertising
21 signage thereon.

22
23
24 ¹ As used herein, the term "Sign Regulations" refers to Chapter I, Article 4.4 of the City Code,
25 and all other City regulations which define, restrict, exempt, prohibit, and/or otherwise regulate
signage in the City, including but not limited to Code Sections 91.106 and 91.6201-91.6216.

1 6. After negotiating these leases, Figueroa consulted and reviewed the
2 City Sign Regulations to determine how to apply for sign permits. Figueroa
3 discovered that the signs fall within the City's definition of a "supergraphic
4 sign." See Sign Reg., §§ 14.4.2. Although supergraphic signs are generally
5 banned, City officials have discretion to grant exemptions from this ban without
6 reference to any objective criteria. Furthermore, Figueroa became aware that the
7 Regulations do not place a time limit on the application process, meaning that it
8 could be weeks or even months before Figueroa received a response to its permit
9 application. As such, Figueroa was extremely wary about submitting to the
10 City's permitting process.

11 7. Indeed, Figueroa's concerns regarding the Sign Regulations have
12 already been validated by this Court. In World Wide Rush, LLC v. City of Los
13 Angeles, 563 F. Supp. 2d 1132 (C.D. Cal. 2008), two companies which operate
14 supergraphic signs throughout the City without permits challenged the City's
15 Sign Regulations on the grounds they are unconstitutional speech restrictions. Id.
16 at 1136-37. When the City issued several Orders to Comply seeking the removal
17 of the signs, the plaintiffs sought a preliminary injunction enjoining the City from
18 enforcing its regulations until the case was resolved. Id.

19 8. The Court granted the injunction on the grounds that plaintiffs'
20 success on the merits was likely. Among several holdings rendered in its
21 opinion, the Court determined that several pertinent Sign Regulations, including
22 Section 14.4.4(B)(9) a/k/a the "supergraphic ban" and Section 14.4.4(B)(11)
23 a/k/a the "off-premise ban," were constitutionally deficient because they granted
24
25

1 unfettered discretion to local officials to license speech.² Id. at 1138-52. The
2 Court was particularly disturbed by the many exceptions to the Regulations
3 which allow City officials to authorize certain individuals and entities to maintain
4 otherwise banned signs whenever they deem fit. Id. at 1141-45.

5 9. The Court ultimately preliminarily enjoined the City from enforcing
6 the invalid regulations against the plaintiffs. Id. at 1152.

7 10. Other recent legal precedents have also called the City's Regulations
8 into question. For example, in February 2008, Commissioner John Green sitting
9 as Superior Court Judge in the case of People v. Sedighan, Los Angeles Superior
10 Court Case No. 7CA00192, determined that the City of Los Angeles' permitting
11 provisions for supergraphic signs were unconstitutional and void. As the City
12 was a party to this proceeding, it is well aware of this finding. Further, in 2007
13 the City lost the case of Metro Lights, L.L.C. v. City of Los Angeles, 488 F.
14 Supp. 2d 927 (C.D. Cal. 2006), before this Court.

15 11. Rather than submit to regulations that have already been found by
16 this and other Courts to be constitutionally invalid on multiple occasions,
17 Figueroa retained a professional sign posting company to post "supergraphic"
18 signs on the subject properties.

19 12. Even though its Regulations have been declared unconstitutional,
20 Figueroa is aware that the City continues to enforce these regulations through the
21 issuance of citations. Figueroa fully anticipates that its signs will soon be cited
22 by the City.

23
24 ² The Court also determined that the City's ban on off-site and supergraphic signs within 2,000
25 feet of a freeway (Section 14.4.6) violated the Central Hudson test applicable to commercial
speech. World Wide Rush, 563 F. Supp. 2d at 1148-52.

13. Figueroa seeks a declaration that the City's Sign Regulations are unconstitutional and an injunction prohibiting the City from enforcing the invalid regulations against it or the property owner at the subject properties.

FIRST CLAIM FOR RELIEF

First and Fourteenth Amendments

14. Plaintiff incorporates by reference the allegations in Paragraphs 1-13 above as if set forth verbatim herein.

15. The Sign Regulations are unconstitutional on their face and as applied because they abridge rights secured by the First and Fourteenth Amendments to the United States Constitution and Article I, §§ 2 and 7 of the California Constitution in that they:

- (a) grant unfettered discretion to City officials to license speech (e.g., Sign Reg., §§ 14.4.4(B)(9), 14.4.4(B)(11), 91.106.3.1, 91.6201.2; 91.6201.2(1)(b));
- (b) lack requisite procedural safeguards, such as a time limit on the application process (e.g., id. at § 91.106);
- (c) violate the Central Hudson test on commercial speech, in that they fail to (i) directly advance a substantial governmental interest or (ii) reach no further than necessary to serve that interest (e.g., Sign Reg., §§ 14.4.4(B)(9), 14.4.4(B)(11), 14.4.5, 14.4.6, 91.106.3.1, 91.6201.2; 91.6201.2(1)(b)); and
- (d) violate equal protection (e.g., Sign Reg., §§ 14.4.4(B)(9), 14.4.4(B)(11), 91.106.3.1, 91.6201.2; 91.6201.2(1)(b)).

16. An actual and justiciable controversy has arisen and now exists between Plaintiff and Defendant concerning the unconstitutionality of the Sign

1 Regulations. A judicial declaration is necessary and appropriate so the parties
2 may ascertain their rights, duties, and obligations with respect to the Sign
3 Regulations.

4 SECOND CLAIM FOR RELIEF

5 Injunctive Relief

6 17. Plaintiff incorporates by reference the allegations in Paragraphs 1-16
7 above as if set forth verbatim herein.

8 18. Despite the constitutional deprivations referenced above, the City
9 intends to cite the subject signs and attempt to have them removed.

10 19. The City should be enjoined from taking any action to remove the
11 subject signs because:

12 (a) there is a substantial likelihood that Plaintiff will show that
13 the regulations which form the basis of the City's actions are
14 unconstitutional, as has already been determined in the World
15 Wide Rush matter and elsewhere;

16 (b) there is a substantial threat that immediate irreparable injury
17 will result if the City is not restrained, namely the loss of
18 speech rights, which is *per se* an irreparable injury;

19 (c) Plaintiff's loss of speech rights far outweighs any potential
20 harm to the City; and

21 (d) allowing Plaintiff to continue to exercise its speech rights will
22 not disserve the public interest.

23 20. Because Plaintiff has satisfied all of the criteria for preliminary
24 injunctive relief, this Court should restrain and/or enjoin the City from enforcing
25 the Sign Regulations during the pendency of this case.

1 WHEREFORE, Plaintiff prays for judgment as follows:

- 2 (1) For a judicial declaration and decree that the Sign Regulations are
3 unconstitutional on their face and as applied to Plaintiff, because
4 they violate rights guaranteed by the First and Fourteenth
5 Amendments to the United State Constitution and Article I, §§ 2 and
6 7 of the California Constitution;
- 7 (2) For this Court to preliminarily and permanently enjoin the City from
8 removing the subject signs;
- 9 (3) For an award of such damages as are authorized by law;
- 10 (4) For an award of attorneys' fees and expenses, pursuant to 42 U.S.C. §
11 1988;
- 12 (5) For a trial by jury on any issue that should not be resolved by the
13 Court as a matter of law; and
- 14 (6) For such other and further relief as the Court may deem just and
15 equitable.

16 DATED: December 23, 2008

WEBB, KLASSE & LEMOND, L.L.C.

17 By: 
18 _____

Matthew C. Klase

19 Attorneys for Plaintiff
20 Figueroa Project 2, L.L.C.
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23
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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

Figueroa Project 2, L.L.C.

PLAINTIFF(S)

v.

City of Los Angeles, a California municipal
 corporation,

DEFENDANT(S).

CASE NUMBER

CV08-08508

PAID

SUMMONS

BY FAX

TO: DEFENDANT(S): City of Los Angeles c/o Mayor Antonio Villaraigosa

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Matthew C. Klase, whose address is 1900 The Exchange S.E., Suite 480, Atlanta, GA 30339. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

DEC 23 2008

Dated: _____

By: Natalie Gonzalez

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Figueroa Project 2, L.L.C.		DEFENDANTS City of Los Angeles, a California municipal corporation	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Matthew C. Klase [SBN 221276], Webb, Klase & Lemond, L.L.C. 1900 The Exchange S.E., Suite 480, Atlanta, GA 30339 (770) 444-0998; (770) 444-0271 (fax)		Attorneys (If Known)	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:40%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:30%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)
CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Plaintiff is alleging violations of the First & Fourteenth Amendments to the U.S. Constitution.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number:

CV08-08508

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

FAX

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). **IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
If yes, list case number(s): _____

VIII(b). **RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☐ No ☒ Yes
If yes, list case number(s): CV08-5066-R; CV07-238-ABC; CV08-04501-GHK (all related to the constitutionality of the City Sign Regulations)

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☒ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. **VENUE:** (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Clark County, Nevada

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. **SIGNATURE OF ATTORNEY (OR PRO PER):** Matthew Klase Date 12/23/08

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))